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File Number:

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**VIA ECF**

The Honorable Lorna G. Schofield  
U.S. District Court for the Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re: Harrington Global Opportunity Fund, Limited v. CIBC World Markets Corp., et al.,**  
**1:21-cv-00761-LGS (S.D.N.Y.)**

Dear Judge Schofield:

We write on behalf of all parties in the above-referenced action. We submit this joint status letter, as ordered by the Court (Dkt. 102) and outlined in the Court's Individual Rule IV.A.2.

As ordered by the Court (Dkt. 107), the parties served their Initial Disclosures on April 11, 2022. The parties served their respective responses and objections to these initial discovery requests on June 6, 2022. The parties have completed document discovery. The Merrill Defendants and TD Defendants each served on Plaintiff requests to admit on November 15, 2022. The parties met and conferred on a schedule for expert discovery on November 15, 2022. The parties will operate in good faith to ensure that any discovery disputes are resolved efficiently to ensure that we meet any Court-ordered discovery deadlines.

As ordered by the Court (Dkt. 128), the parties will submit to the Court by December 9, 2022, a stipulation and proposed order setting forth a schedule for Plaintiff to file a second amended complaint and briefing on Defendants' motion to dismiss in accordance with the Court's Individual Rule III.B.4. In a separate letter, the parties will explain why a stay of discovery would be more efficient than completing fact discovery prior to filing a motion to dismiss.

Respectfully submitted,

/s/ Abby F. Rudzin

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